

## Message

**From:** Bizot, David A - DNR [David.Bizot@wisconsin.gov]  
**Sent:** 3/13/2017 8:14:36 PM  
**To:** Aburano, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5058d128e7854b4895441ff23c8f6c01-DAburano]  
**Subject:** RE: Just thinking about our ozone chat on Sheboygan

I follow you and we've discussed that here. This is a regional pollutant, so there should be no presumption that emission sources would correlate spatially to areas measuring potential violations of a standard. A modeling result like the one we discussed would provide powerful evidence of that (and reinforce the importance of ensuring upwind state 110a2d obligations are met). Beyond that, at some point it seems like the historical CAA construct sort of breaks down: why hold "local" sources responsible for an issue they cannot measurably influence? I've a few other thoughts on this we could discuss. This is a good question – thanks for giving the situation some thought.

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**From:** Aburano, Douglas [mailto:aburano.douglas@epa.gov]  
**Sent:** Monday, March 13, 2017 2:50 PM  
**To:** Bizot, David A - DNR  
**Subject:** Just thinking about our ozone chat on Sheboygan

If you were to give us modeling showing all sources zeroed out and no effect on O3 concentrations, this then shifts the question to, where is there nonattainment in Sheboygan County and how do we draw that boundary?

In the case of Kenosha, we focused on contribution to the violating monitor, and in that case the monitor wasn't even in Kenosha, it was Lake Co., IL. It was simple enough to look at where the sources were in Kenosha and then to say that most, I think it was something like 90+%, are east of the I-94 border. So, if you said, there is no contribution from Sheboygan sources to the Sheboygan violation, how do you capture the portion of the area that has >70 ppb air? It's no longer a contribution argument like it was in Kenosha. Make sense?

I don't have the answer but it's the question that popped into my head after we talked.

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